RECEIVED
DEPARTHENT OF JUSTICE
FEB 16 9 45 AM *70
REGISTRATION SECTION

UNITED STATES DEPARTMENT OF JUSTICE WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as Amended For Six Month Period Ending JAN 2 5 1970 Registration No. 2036 Name of Registrant New York Committee of INTERNATIONAL COMMITTEE OF PASSENGER LINES Vincent A. Demo, Chairman Business Address of Registrant 25 Broadway, New York, N.Y. 10004 I - REGISTRANT 1. Has there been a change in the information previously furnished in connection with the following: (a) If an individual: (1) Residence address (2) Citizenship (3) Occupation (b) If an organization: (1) Name (2) Ownership or control (3) Branch offices 2. Explain fully all changes, if any, indicated in Item 1. IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5. 3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this No 🙀 6 month reporting period? Yes 🔲 If yes, furnish the following information: Date Connection Position Ended

If yes, furnish the	e following information:		
Name	Residence Address	Citizensbip	Position Date Assume
. Has any person a principal? Yes	named in Item 4 rendered service No 🔀	es directly in furthernace	of the interests of any foreign
If yes, identify ea	ich such person and describe his	services.	
minated their emp	es or individuals other than offici loyment or connection with the re	als, who have filed a short gistmat during this 6 month	form registration statement, tenter reporting period?
If yes, furnish the	following information:		
Name	Position or	connection	Date terminate
During this 6 mans	·h sanagina naid ha		
the registrant who principal in other	th reporting period, have any person rendered services to the registre than a clerical or secretarial, or	ant directly in furtherance	of the interests of any foreig
the registrant who principal in other to No	rendered services to the registre than a clerical or secretarial, or	ant directly in furtherance	of the interests of any foreig
the registrant who principal in other to No	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information:	ant directly in furtherance in a related or similar capac	of the interests of any foreig
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio
the registrant who principal in other Yes No If yes, furnish the	rendered services to the registre than a clerical or secretarial, or x following information: Residence	ant directly in furtherance in a related or similar capac Position or	of the interests of any foreig city? Date connectio

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month a Yes X No	reporting period?
If yes, furnish the following information:	
Name of foreign principal	Date of Termination
Clipper Line	December 31, 1969
9. Have you acquired any new foreign principal during this 6 month reporting	period? Yes No X
If yes, furnish following information:	
Name and address of foreign principal	Date acquired
Sun Line, & Holland-America Line, Pier 40 N.R., K Paquet Line, 4 Rue Capacineo, Paris 10, France	Mar. 1969
10. In addition to those named in Items 8 and 9, if any, list the foreign principa sent during the 6 month reporting period.	als whom you continued to repre-
(List of Steamship Lines is attached)	
III - ACTIVITIES	
11. During this 6 month reporting period, have you engaged in any activities for foreign principal named in Items 8, 9 and 10 of this statement? Yes	or rendered any services to any
If yes, identify each such foreign principal and describe in full detail your ac	ctivities and services;
Registrant has kept all of its principals advidevelopments affecting their interests as passe including compliance with sections B & C and se P.L. 89-777; possible amendment of that statute in advertising requirements; bills to abolish r vessel owners to limit their liability under se bills to eliminate pollution of navigable water from vessels; bills to limit stopovers by foreignorts.	enger ship operators ections 2 & 3 of to delete disclosure eight of passenger ection 46 U.S.C.sec.183
These developments have been discussed at meeti New York representatives of the foreign princip	ngs attended by als.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(aX9)). A registrant who represents more than one foreign principal is required to list in the statements be files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

as defined below?
Yes 🙀 No 🗌
If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.
The only "political activity" engaged in by registrant has consisted of occasional visits to and correspondence with members of Congress and representatives of the U.S. Coast Guard, Federal Maritime Commission and U.S. Customs Bureau in connection with the matters referred to in answer to question 11. Also appeared at hearings before House and Senate Merchant Marine Committees.
13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?
Yes No X
If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

-5-

IV - FINANCIAL INFORMATION

		14 - 1 114/51408/5	E INFORMATION	
14. () RECEIPTS -	MONIES		
	and IU of this	month reporting period, have your statement, or from any other sou ions, income or money either as c	uce, for or in the interests of a	cipal named in Items 8, 9 any such foreign principal
	Yes 🗌	No X	•	
	If yes, set forth below in the required detail and separately for each foreign principal an account of s monies.3			
	Date	From Whom	Purpose	A moun.
				Total
14. (b	During this 6 foreign princip	THINGS OF VALUE month reporting period, have you bal named in Items 8, 9 and 10 or y such foreign principal? No	received any thing of value ⁴ of this statement, or from any o	other than money from any other source, for or in the
	76 6 1			

If yes, furnish the following information:

Name of foreign principal

Date Received Description of thing of value

Purpose

A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

4 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. ((a)	DISBURSEMENTS -	MONIFS
- J.		DINDORSCHENIS.	MODICS

(1) di	sburse	6 month reporting period, have you ed or expended monies in connection with 8, 9 and 10 of this statement? Yes X	th activity on behalf of any foreign princip	al named
		ted monies to any such foreign principal		
If yes	, set fo		ately for each foreign principal an accoun	t of such
Date		To Wbom	Purpose	Amount
Oct. 3	30	Burlingham, Underwood, Wright, White & Lord	preparation of statements and testimony for Senate & House. Hearings and other legal advices on shipping matters. (specimens attached).	\$1250.88
Dec. 3	80	Ditto	Ditto	\$5395.15
Other	Ехре	enditures (July 25, 1969	- January 25, 1970)	
Salari	.es	\$	15,426.69	
Rent, Cables	Phor $X \in \mathcal{X}$	oplies, nes, Postage, eroxing, eous (Insurances),	7,072.34	
expens	es (g and related (fares, meals, ation, etc.),	4 222 22	
enrerr	CTITI	EIIC	4,338.23	

All of these monies were disbursed on behalf of all of the foreign principals jointly shown in reply to question 10.

\$33,473.29

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

	During this furtherance of and 10 of this	of or in connection with	d, have you disposed of any activities on behalf of any	rthing of value ⁵ other foreign principal name	than money in ed in items 8, 9
	Yes 🗌	No 🔀			
	If yes, furnis	h the following informati	on:		
	Date disposed	Name of person to whom given	On bebalf of wbat foreign principal	Description of thing of value	Purpose
(c)	During this 6 or through an an election to select can	y other person, made any	ave you from your own funds contributions of money or or n connection with any primarce? Yes No	her things of value in c y election, convention,	connection with
	Date	Amount or thing	Name of	Name of	
	Date	of value	political organization	candidate	
	· · · · · · · · · · · · · · · · · · ·				
		V - P0	DLITICAL PROPAGANDA		
believes or any se of a gove or promo motes an any othe	will, or which ection of the pu ernment of a for te in the United by racial, social r American rep	ssion by any person (1) wh he intends to, prevail upon blic within the United State eign country or a foreign po States racial, religious, o , political, or religious disc	baganda'' as including any oral, ich is reasonably adapted to, or , indoctrinate, convert, induce, or , induce in the political swith reference to the political party or with reference to k social dissensions, or (2) which could be conference to the political party or with reference to k social dissensions, or (2) which could be conference to political subdiving government or political subdiving government.	which the person disseming in any other way influe or public interests, police the foreign policies of the discountry in advocates, advises, in the page of foreign policies of the discountry in the page of foreign policies.	nating the same nce a recipient ies, or relations ne United States stigates, or pro-
16. Dur	ing this 6 mon paganda as del	th reporting period, did y fined above? Yes	ou prepare, disseminate or ca	ause to be disseminated	d any political
IF Y	YES, RESPON	D TO THE REMAINING	ITEMS IN THIS SECTION V.		
17. Ider	stify each suct	foreign principal.			

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

	Yes No If yes, identify each such foreign principal, specify amount, and indicate for what period of	time.
<u> </u>	19. During this 6 month reporting period, did your activities in preparing, disseminating or cau	sing the disse
	ination of political propaganda include the use of any of the following:	
	Radio or TV broadcasts Magazine or newspaper Motion picture films Le	tters or telegran
	publications :	ctures or speeches
	Other (specify)	
Ю.	20. During this 6 month reporting period, did you disseminate or cause to be disseminated poli among any of the following groups:	tical propagan
	Public Officials Newspapers Librario	es
	Legislators Educati	ional institutio
	Government agencies Civic groups or associations Nationa	lity groups
	Other (specify)	
1.	21. What language was used in this political propaganda:	
	English Other (specify)	
2.	2. Did you file with the Registration Section, Department of Justice, two copies of each item of	of political pro
	aganda material disseminated or caused to be disseminated during this 6 month reporting p	eriod?
_	Yes No No	
3.	23. Did you label each item of such political propaganda material with the statement required to the Act? Yes No	by Section 4(b)
4.	4. Did you file with the Registration Section, Department of Justice, a Dissemination Report	for each item
	such political propaganda material as required by Rule 401 under the Act? Yes No	
_		
	VI - EXHIBITS AND ATTACHMENTS	
25.		
25.		:
5.	5. EXHIBITS A AND B	:
5.	5. EXHIBITS A AND B (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following	:
5.	5. EXHIBITS A AND B (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: Exhibit A ⁶ Yes No X	:
5.	(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following. Exhibit A ⁶ Yes No X Exhibit B ⁷ Yes No X If no, please attach the required exhibit.	
5.	(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following. Exhibit A ⁶ Yes No X Exhibit B ⁷ Yes No X If no, please attach the required exhibit. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals in Item 9 the following.	
25.	(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following. Exhibit A ⁶ Yes No X Exhibit B ⁷ Yes No X If no, please attach the required exhibit. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals in Item 9 the following. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals. Yes No No	
25.	25. EXHIBITS A AND B (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following. Exhibit A ⁶ Yes No X Exhibit B ⁷ Yes No X If no, please attach the required exhibit. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals are presented during this six month period? Yes No If yes, have you filed an amendment to these exhibits? Yes No X	
!5.	(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following. Exhibit A ⁶ Yes No X Exhibit B ⁷ Yes No X If no, please attach the required exhibit. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals in Item 9 the following. (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principals. Yes No No	

26.	EXHIBIT C	
	If you have previously filed an Exhibit C ⁸ , state wheth month reporting period.	er any changes therein have occurred during this 6
	Yes No X	
	If yes, have you filed an amendment to the Exhibit C?	Yes No
	If no, please attach the required amendment.	
27.	SHORT FORM REGISTRATION STATEMENT	
	Have short form registration statements been filed by a plemental statement?	all of the persons named in Items 5 and 7 of the sup-
	Yes No INAPPLICABLE - No s	such persons named in item 5 & 7
	If no, list names of persons who have not filed the requi	red statement.
ten sig	The undersigned swear(s) or affirm(s) that he has (they have tement and the attached exhibits and that he is (they are) its are in their entirety true and accurate to the best of him ned make(s) no representation as to the truth or accuracy gistration Statement, if any, insofar as such information is	familiar with the contents thereof and that such con- s (their) knowledge and belief, except that the under- of the information contained in attached Short Form s not within his (their) personal knowledge.
		(Type or print name under each signature)
iste by a perf	(Both copies of this statement shall be signed and sworn perfore a notary public or other person authorized to admin- er oaths by the agent, if the registrant is an individual, or a majority of those partners, officers, directors or persons forming similar functions who are in the United States, if registrant is an organization.)	Vincent A. Demo
	Subscribed and sworn to before me at her forh	new Upolo
		▼
this	10 th day of February	, 19 <u></u>
		Justle Kolaco
		LUCILLE KOLACZ Notary Public, State of New York No. 41-7330290, Queens Co. Certificate file fin New York County
	My commission expires <u>Rarch</u> 30	, 19

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Internal Security Division, Department of Justice, Washington. D.C. 20530.

Members of NEW YORK COMMITTEE of the INTERNATIONAL COMMITTEE OF PASSENGER LINES

CANADIAN PACIFIC

COSTA LINE, INC.

CUNARD LINE LIMITED

FRENCH LINE

CERMAN ATLANTIC LINE 12-1-13

GREEK LINE

HOLLAND-AMERICA LINE

HOME LINES INC.

INCRES LINE

ITALIAN LINE

NATIONAL HELLENIC AMERICA LINE

NORTH GERMAN LLOYD

NORWEGIAN AMERICA LINE

PAQUET LINE

P & O LINES INC.

SUN LINE

SWEDISH AMERICAN LINE

BEFORE THE COMMITTEE OF MERCHANT MARINE AND FISHERIES

HOUSE OF REPRESENTATIVES

RECISTRATION SECTION

STATEMENT

of

Vincent A. Demo

My name is Vincent A. Demo and I am Chairman of the New York Committee of the International Committee of Passenger Lines. This Committee is comprised of foreign steamship lines providing passenger service to and from the United States, including the vast majority of cruises from American ports. A list of the carrier members of this organization is attached hereto and made a part hereof.

The International Committee of Passenger Lines (ICPL) strongly supports H.R.210, which would have the effect of eliminating the elaborate disclosure procedures required under subsection (b) of Section 4400 of the revised statutes, as amended $\sqrt{4}6$ U.S.C. 3627. We understand that our position on this subject is identical with that of the American passenger lines.

The section in question is part of Public Law 89-777, approved on November 6, 1966. It requires owners, operators, agents or any persons selling passage on foreign or domestic passenger vessels of 100 gross tons or over and having berth or stateroom accommodations for 50 or more passengers, embarking

passengers at United States ports, to notify prospective passengers of the safety standards. The interpretive requlations in implementation of the statute, stipulate that all promotional literature and advertising in or over any medium of communication within the United States soliciting passengers for ocean voyages anywhere in the world is required to include similar information. In addition, after booking passage and before embarking from a United States port, all passengers must be given a written or printed notice of the safety factors of the vessel. However, in subsection (c) of the same section it was provided that such vessels could not depart after November 2, 1968, from a United States port with American nationals embarked there unless the Coast Guard had found that they complied with standards set forth in the International Convention for the Safety of Life at Sea, 1960, as modified by the amendments proposed by the 13th Session of the Maritime Safety Committee of the Intergovernmental Maritime Consultative Organization (IMCO), contained in Annexes I through IV of the Note Verbale of the Secretary General of that Organization, dated May 17, 1966.

As a consequence, since November 2, 1968, no vessel can sail from an American port without complying with the Convention safety standards and, because of the present single safety standard, the entire purpose of the disclosure requirements has now been eliminated. There is, therefore, no longer

any occasion for disclosure at the time of booking nor for the advertising requirements. Such requirements have become more confusing than helpful. They would be eliminated by the present bill.

These wholly superfluous requirements are unduly burdensome to passenger carriers and their sales representatives and necessarily impede the promotion of steamship During the period that these regulations have been in effect, there has been a pronounced change in the pattern of promotion for steamship passenger transportation and cruises. Travel agents, who have been counted on to produce over 85% of the travel business, either cannot afford to or will not incur the additional cost of purchasing more advertising space to include the required safety text, nor will they sacrifice promotional text for a description of safety standards. Advertising by them has consequently dropped appreciably. resultant loss of direct contact with potential travelers by those who would normally be consulted has brought about a diminution of interest in steamship travel. Steamship carriers have been unable to use the effective media of television and radio advertising, so advantageously utilized by airlines, because of the prohibitive expense of paying for and repeating the extensive safety comment required for each commercial.

Outdoor advertising, formerly employed successfully by steamship carriers, has become impracticable because of

the requirement that the 24-word safety legend be displayed in the same size as the fewer words of the actual advertisement.

Apart from the foregoing rather clear impediments to normal advertising routines, is it not a bit incongruous to extol the glamour and comfort of ship travel and follow it immediately with an extended review of safety features? The constant and unwarranted emphasis on safety requirements must strongly imply that there is something inherently dangerous in ocean transportation, not present in other means of transportation, for such advertising is only required where there is a very real and imminent danger. The required warning must inevitably lead the reader to question whether the threatened risk to life and limb does not outweigh the promised pleasure and relaxation. We feel very strongly that this has had the unfortunate consequence of deterring many potential passengers from the utilization of passenger services of both foreign and American lines who have gone to such pains to build up and maintain their services.

We assert that the dangers of ocean transportation are certainly less than those of other forms of transportation—or even of staying at home, for that matter—and we believe that it is unfair to our industry to impose this type of a handicap under presently existing circumstances.

The objectives of the statute having been achieved and all passenger vessels now having to maintain the desired standards, the purposes which prompted the adoption of subsection (a)

of Section 4400 of the revised statutes no longer exist. Therefore, it is hoped by these carriers (and, we believe, all others interested in international passenger transportation) that the now unnecessary requirements will be eliminated by the adoption of H.R.210.

On behalf of the lines which I represent, I thank you for the opportunity to present their views.

encl.

Vincent A. Demo

Members of NEW YORK COMMITTEE of the INTERNATIONAL COMMITTEE OF PASSENGER LINES

CANADIAN PACIFIC

CLIPPER LINE

COSTA LINE, INC.

CUNARD LINE LIMITED

FRENCH LINE

GERMAN ATLANTIC LINE

GREEK LINE

HOLLAND-AMERICA LINE

HOME LINES INC.

INCRES LINE

ITALIAN LINE

NATIONAL HELLENIC AMERICA LINE

NORTH GERMAN LLOYD

NORWEGIAN AMERICA LINE

PAQUET LINE

P & O LINES INC.

SUN LINE

SWEDISH AMERICAN LINE

STATEMENT OF MR. VINCENT A. DEMO

before the

SENATE MERCHANT MARINE COMMITTEE

on S 1924

Mr. Chairman and Members of the Subcommittee:

I am Vincent A. Demo and I am Chairman of the New York
Committee of the International Committee of Passenger Lines.
This Committee is comprised of foreign steamship lines providing passenger service to and from the United States, including the vast majority of cruises from American ports. A list of the carrier members of this organization is attached hereto and made a part hereof.

The International Committee of Passenger Lines (ICPL) strongly supports S. 1924, which would have the effect of eliminating the elaborate disclosure procedures required under subsection (b) of Section 4400 of the revised statutes, as amended (46 U.S.C. 362). We understand that our position on this subject is identical with that of the American passenger lines.

The section in question is part of Public Law 89-777, approved on November 6, 1966. It requires owners, operators, agents or any persons selling passage on foreign or domestic passenger vessels which embark passengers at United States ports,

to notify prospective passengers of the safety standards. The interpretive regulations in implementation of the statute, stipulate that all promotional literature and advertising in or over any medium of communication within the United States is required to include such information. Additionally, after booking passage and before embarking from a United States port, all passengers must again be given a written or printed notice covering the safety factors of the vessel.

The statute also provided that vessels could not depart after November 2, 1968 with American nationals from a United States port unless the Coast Guard had found that they complied with standards set forth in the International Convention for the Safety of Life at Sea, 1960, as modified by the amendments proposed by the 13th Session of the Maritime Safety Committee of the Intergovernmental Maritime Consultative Organization (IMCO), contained in Annexes I through IV of the Note Verbale of the Secretary General of that Organization, dated May 17, 1966.

As a consequence, since November 2, 1968, no vessel can sail from an American port without complying with the established single uniform safety standard and the entire purpose of the disclosure requirements has therefore been eliminated. There is, therefore, no longer any occasion for

disclosure at the time of booking nor for the advertising requirements.

These requirements, which have become wholly superfluous since the November 2, 1968 deadline has passed, are unduly burdensome and necessarily impede the promotion of steamship travel. During the period that these regulations have been in effect, there has been a pronounced change in the pattern of promotion for steamship passenger transportation and cruises. Travel agents, who are counted on to produce over 85% of the travel business, either cannot afford to or will not incur the additional cost of purchasing more advertising space to include the required safety text, nor will they sacrifice promotional text for a description of safety standards. Advertising by them has consequently dropped off appreciably and has brought about a diminution of interest in steamship travel.

Steamship carriers have been unable to use the effective media of television and radio advertising in the promotion of their services because of the prohibitive expense of paying for and repeating the extensive safety comment required for each commercial. For example, in a 30 second television commercial which mentions only one ship, the cost attributable to disclosure would be \$450 out of a total of \$1800 for a low preference commercial and as much as \$1200 for a 30 second commercial in prime time - these costs would, of course, be higher if more than one vessel were being advertised.

Outdoor advertising, formerly employed successfully on occasion by steamship carriers, has had to be eliminated because of the requirement that the 24-word safety legend be displayed in the same size as the few words of the actual advertisement.

Apart from the foregoing rather clear impediments to normal promotional routines, it is more than a little incongruous to extol the glamor and comfort of ship travel and follow it immediately with an extended review of safety features involving repeated references to "safety" and "fire". The constant and unwarranted emphasis on safety requirements strongly implies that there is something inherently dangerous in ocean transportation, not present in other means of transportation. The required warning must inevitably lead the reader to question whether the threatened risk to life and limb does not outweigh the promised pleasure and relaxation. We feel very strongly that this has had the unfortunate consequence of deterring many potential passengers from the utilization of services provided by both foreign and American lines who have gone to such pains to build up and maintain their services.

We assert that the dangers of ocean transportation are certainly less than those of other forms of transportation—or even of staying at home, for that matter—and we believe that it is unfair to our industry to impose this type of a handicap under presently existing circumstances.